

The image shows the cover of a spiral-bound notebook. The cover has a light beige, textured background, possibly representing a cloth or paper texture. A dark brown border frames the entire cover. On the left side, a silver-colored metal spiral binding is visible, consisting of a series of loops. The text is centered on the cover in a bold, black, serif font.

# **Utah Department of Environmental Quality**

## **Division of Air Quality**

**Vernal, Utah**

**August 28, 2007**

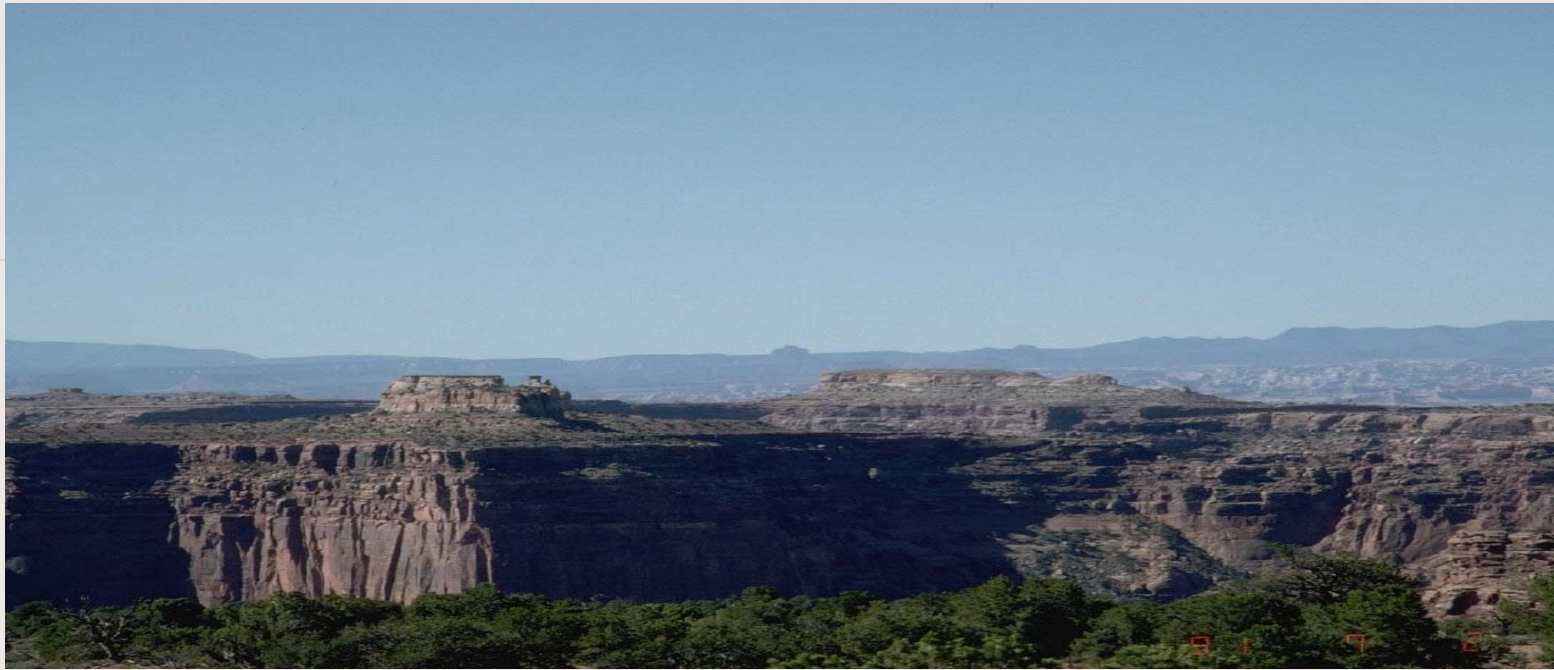
# DAQ Involvement in the RDCC Process

- DAQ does not have general oversight responsibility for projects within the state.
- Rather, we make specific comments that advise of existing state rules or requirements.
- These rules pertain to:
  - Mining activities
  - Oil & Gas drilling
  - Pipeline projects
  - Construction projects (Highway, Airport, City Renovations)
  - Forest fuel management
  - Fire management plans
  - EA and EIS reviews

# Utah State Rules

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- Designed to protect and advise.
- Consist of:
  - Basic design requirements
  - Permitting requirements
  - Compliance requirements
  - Fugitive dust requirements
  - Special equipment requirements
  - Warnings
    - Asbestos handling procedures
    - Lead Based Paint removal procedures



- Air Quality comments are specifically designed to address air quality related values in relation to sensitive visual resources
  - Visibility considerations in Class I areas
  - Contribution to Regional Haze

# DAQ Comments: EA's & EIS's

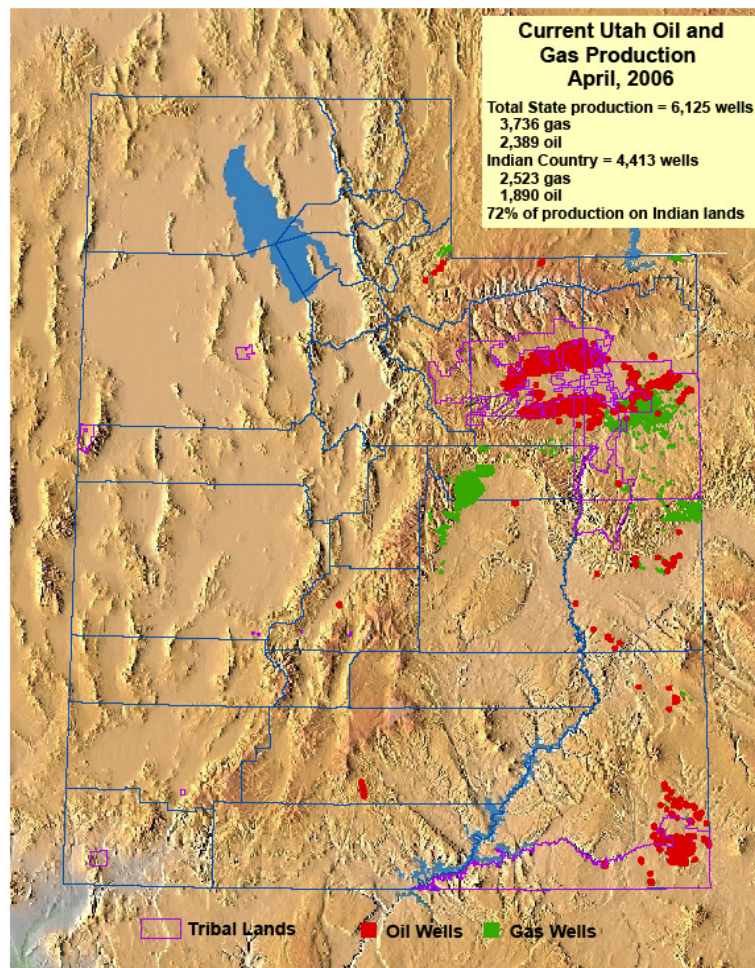
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- Many EA's or EIS's are for specific projects
- They do not take into account the number of individual projects that may be occurring in a given area

# Air Quality Impacts

- There has been significant oil & gas development in many areas of Utah since 2000
  - Uintah Basin (Duchesne & Uintah Counties)
  - Central Utah (Carbon County)
  - South Central Utah (Emery County)
  - Southeast Utah (San Juan County)
- Development within several of the national forests is proposed in the near future
- Cumulative impacts from all sources need to be considered when making DAQ comments

# Air Quality Impacts



- 70% of oil & gas wells statewide are located on Indian Land
- 90% of oil & gas wells in the Uinta Basin are located on Indian Land

# Many Factors Affect Air Quality

- Emissions come from different sources
  - Biogenic
  - Oil & gas operations (Uintah County 2006)
    - 10,000 wells under construction, permitted or planned
    - 5,700 producing oil & gas wells
  - On and off road traffic
    - Access roads to the well heads, as well as truck traffic to move materials, supplies and equipment to establish, operate, and maintain each new well.

# National Ambient Air Quality Standard for Ozone

- Current Standard – 0.08 ppm
- EPA Proposed Ozone Standards:
  - Primary Standard
    - Full range being considered 0.060 – 0.080 ppm
    - Probably will be set between 0.070 – 0.075 ppm
  - Secondary Standard
    - W126 format to be set between 7 – 21 ppm-days
    - EPA projects much of Western US will have difficulty meeting this standard

# DAQ Concerns

- DAQ is very concerned about the effects of increased oil & gas activity throughout the state. We are trying to stay ahead of the game by anticipating air quality problems **before** they become nonattainment problems.
- Nonattainment will result in significant new controls (SIP Controls)
- Nonattainment on Tribal Lands will result in direct EPA Control (FIP)

# Interim Measures

- DAQ recommends that BLM/USFS adopt emission standards for stationary engines associated with proposed oil & gas operations
  - Emission Standards Recommended by the Four-Corners Task Force
    - 2 gm/bhp-hr for engines less than 300 HP
    - 1 gm/bhp-hr for engines over 300 HP

# Interim Measures

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- These interim standards would positively affect air quality and would be consistent with what is being done in neighboring jurisdictions.
- They would not replace the need for a comprehensive analysis of regional air quality, but rather they reflect interim steps that Utah believes should be implemented if full field development is to proceed.

Further discussion and recommendations will be presented in the monitoring and modeling panel discussion

